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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

ANDREW MARSHALL and all other
similarly situated,

Plaintiff,

v.

BONDED ADJUSTMENT
COMPANY, a Washington
Corporation, and SPOKANE
EMERGENCY PHYSICIANS, P.S., a
Washington Corporation,

Defendants.

Case No.: CV-11-022-RMP

DECLARATION OF MICHAEL D.
KINKLEY IN SUPPORT OF
PLAINTIFF'S MOTION FOR ENTRY
OF STIPULATED PROTECTIVE
ORDER

Michael D. Kinkley declares under penalty of perjury as provided for by the
laws of the United States, 28 U.S.C. § 1746.

1. I am one of the attorneys representing the Plaintiff in this matter.
2. The parties have agreed to the entry of the proposed Protective Order.

DECLARATION OF MICHAEL D.
KINKLEY IN SUPPORT OF PLAINTIFF'S
MOTION FOR ENTRY OF STIPULATED
PROTECTIVE ORDER -1-

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3. Defendant Bonded Adjustment and Spokane Emergency Physicians have indicated that some of the discovery and/or responses to Initial Disclosures may contain personal or private (including possibly medical information).
4. Plaintiff proposed the attached Protective Order which fairly assigns duties and a process for claiming confidentiality, conferring, and then proceeding if an agreement cannot be reached.
5. The proposed Protective Order has been entered in other cases in Eastern District of Washington and is based upon a form Protective Order used in other jurisdictions adopted by local rule.
6. While it is the Defendants' responsibility to seek a Protective Order (if they are refusing to produce Initial Disclosures or discovery), the Plaintiff is requesting that the proposed Protective Order be entered in order to maintain the orderly progression of the case.

Dated this the 1st day of April, 2011.

Michael D. Kinkley P.S.

s/Michael D. Kinkley

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CM/ECF CERIFICATE OF SERVICE

I hereby certify that on the 1st day of April, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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s/Scott M. Kinkley

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